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*Attorneys for Plaintiffs*

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9 **UNITED STATES DISTRICT COURT**  
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12 **DISTRICT OF NEVADA**  
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15 DESHUN THOMAS, individually, and as Natural  
16 Parent and Guardian for LOZORYA JONES, and  
17 KRISTIN WOODS as Co-Guardian Ad Litem for  
18 LOZORYA JONES,  
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21 CASE NO.: 2:19-cv-00282-APG-PAL  
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23 Plaintiffs,  
24 vs.  
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26 BEVERLY DADE, in her official capacity;  
27 RICHARD FULLER, in his official capacity;  
28 PATTI SCHULTZ, in her official capacity; PAT  
SKORKOWSKY, in his official capacity; HELEN J. STEWART SCHOOL; and CLARK  
COUNTY SCHOOL DISTRICT, a Political  
Subdivision of the State of Nevada, DOE  
TEACHER'S AIDE in his/her official capacity,  
DOES I through X, inclusive; and ROES I  
through X, inclusive,  
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31 **STIPULATION AND ORDER  
(FIRST REQUEST)**  
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33 Defendants.  
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36 **IT IS HEREBY STIPULATED** by and between the parties hereto, through their respective  
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1        This is Plaintiff's first request for an extension. Plaintiffs' counsel who is responding to  
2 Defendants' motion is relatively new to the law firm GANZ & HAUF. On March 6, 2019 Plaintiffs'  
3 counsel John C. Funk, Esq., contacted opposing counsel, Crystal Herrera, Esq., requesting an  
4 extension as a professional courtesy. Plaintiffs' counsel requested the extension of time to respond  
5 based upon various personal and professional deadlines. Plaintiffs' counsel is getting married on  
6 March 16, 2019 and has been heavily involved in planning, coordinating and combining households  
7 all of which have had specific deadlines. For example, Plaintiffs' counsel must move his fiancé out  
8 of her current residence by Saturday, March 9, 2019.

9  
10      Plaintiffs' counsel has spent his evenings moving, planning and preparing for family who are  
11 coming to Nevada from outside of the state for this significant event. Plaintiffs' counsel has several  
12 other personal matters also occurring this week as well as other professional deadlines which could  
13 not be moved.

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